

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)

Amendment of Part 13 and 80 of the)
Commissions Rules Concerning Maritime)
Communications)

WT Docket No. 00-48 and 02-102
RM-9499

**Reply Comments By
Recreational Boating Association of Washington**

Submitted September 16, 2002

The Recreational Boating Association (RBAW) reply comments are in response to the initial comments by other parties to the Further Notice of Proposed Rulemaking contained in WT Docket No. 02-102(RM-9499) and refer to specific paragraph numbers of WT Docket 02-102.

US Coast Guard Comments

Paragraphs 109 and 110. Voluntary Restricted GMDSS License.

The key thing to remember is that at the present time VHF-DSC training of recreational vessel operators is voluntary. We must therefore have a program that is a simple and low cost process that is administered by representatives of those that will be affected by the process and results.

There is agreement that the course and/or examination provider would issue a certificate of completion. We see no need for the FCC to provide a license. Getting the FCC to provide a license would increase the cost and require the applicant to file several FCC forms.

We suggest that the certificate of examination completion be entitled "Voluntary Radiotelephone Certificate"(VC). The qualification for said certificate should be the successful completion of an examination covering operating procedures for VHF and VHF-DSC. Many current FCC licenses are based on passing the requisite examination. Both the US Power Squadrons and US Coast Guard Auxiliary currently issue certificates of course completion based on passing the course examination without attending the class. Under an agreement with Industry Canada the Canadian Power and Sail Squadrons issue the Restricted Operators Certificate (Marine) based on passing the examination. The choice of classroom or self-study to prepare for the examination should be a choice determined by the person taking the examination.

Paragraph 119. Digital Selective Calling Equipment

We concur that changes to 80.225 should be deferred until after the adoption of Rec. ITU-RM 493.11 and IEC 62238.

We note that the Coast Guard will ask for a rulemaking to include the above mentioned ITU and IEC requirements in all DSC equipment. The requirement to include the dual receiving function and integral GPS and other features could easily price DSC equipment out of a major sector of the recreational vessel market. Most of the smaller vessels operate in areas of both Coast Guard VHF and Cellular phone coverage. As non DSC VHF radios become less available, we are concerned that many small vessel operators will use Cellular phones which in most instances they already have in place of VHF.

We assume that the Coast Guard reference to "all DSC equipment" does not indicate that the Coast Guard would not support a grandfather exemption for existing DSC equipment.

We feel that SC-101 has provided the minimum DSC features needed by small vessel operators without a significant cost increase and at the same time it allows manufactures to add additional features based on market demand.

General Comments

We concur with the matters set forth in the Coast Guard Petition for Partial Reconsideration. Many comments have been submitted on Sections of Parts 13 and 80 which do not relate to specific Sections set forth in Paragraphs 107 through 132 of WT Docket No. 02-102. Some of the comments were asking for clarifying language while others advocate changes in actions taken by the Commission. It is our understanding that the Further Notice of Proposed Rulemaking, contained in WT Docket No. 02-102, was not intended to solicit comments on all Sections of Parts 13 and 80. We have therefore commented only on certain of the specific Sections enumerated in Paragraphs 107 through 132 of WT Docket No. 02-102.

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Respectfully submitted,

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